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**CH2MHILL**

October 28, 2004

277085.17.30

Ms. Paula Bisson
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Subject: Summary Report for the Site Characterization and Removal Action for
Polychlorinated Biphenyls at Building 84A, Investigation Area D1

Dear Ms. Bisson:

Enclosed is the Summary Report for the Site Characterization and Removal Action for
Polychlorinated Biphenyls at Building 84A, Investigation Area D1 for Mare Island, Vallejo,
California.

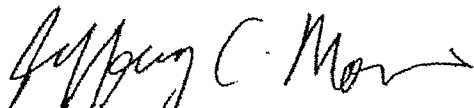
This document was prepared by Lennar Mare Island as part of the scope of the
Environmental Services Cooperative Agreement to complete remaining environmental
work at Mare Island and in accordance with the Consent Agreement between LMI, City of
Vallejo, and DTSC.

Please submit your comments to Paul Scherbak or me at the above address or via e-mail at
Jeff.Morris@ch2m.com by November 28, 2004.

If you have any questions regarding this document, please contact me or Paul Scherbak at
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Sincerely,

CH2M HILL


Jeffery C. Morris, P.E.

October 28, 2004

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October 28, 2004

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Summary Report

**Site Characterization and
Removal Action for
Polychlorinated Biphenyls at
Building 84A,
Investigation Area D1
Mare Island,
Vallejo, California**

Prepared for
Regulatory Agencies

October 2004

CH2MHILL

155 Grand Avenue, Suite 1000
Oakland, CA 94612

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Acronyms and Abbreviations

µg	micrograms
bgs	below ground surface
CA/FO	Consent Agreement/Final Order
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act of 1980
cm ²	square centimeters
DTSC	Department of Toxic Substances Control
EETP	Eastern Early Transfer Parcel
IA	Investigation Area
LMI	Lennar Mare Island
mg/kg	milligrams per kilogram
Navy	United States Department of the Navy
ND	not detected
NFA	No Further Action
PCB	polychlorinated biphenyls
PRG	preliminary remediation goal
SSPORTS	Supervisor of Shipbuilding Portsmouth
TSCA	Toxic Substances Control Act
UL	Unknown Location
USEPA	United States Environmental Protection Agency

1.0 Introduction

This report, prepared in accordance with 40 CFR 761.61 (a), provides a summary of the polychlorinated biphenyl (PCB) cleanup at the Building 84A Unknown Location (UL)#01 on the Mare Island Eastern Early Transfer Parcel (EETP). CH2M HILL prepared this document in compliance with the Consent Agreement and Final Order (CA/FO) between the United States Environmental Protection Agency (USEPA), United States Department of the Navy (Navy), with the City of Vallejo and Lennar Mare Island (LMI) as intervenors (USEPA et al. 2001). The CA/FO sets forth the Toxic Substances Control Act (TSCA) requirements for the EETP. Paragraph 12 of the CA/FO is applicable to Building 84A UL#01 and requires that any cleanup of PCBs at Building 84A UL#01 must satisfy the requirements of 40 CFR 761.61.

The cleanup of PCB contamination consisted of a concrete floor removal action and was conducted in accordance with the regulatory agency approved *Notification Regarding Self-implementing On-site Cleanup and Disposal of Polychlorinated Biphenyl Remediation Waste at Building 84A Within Investigation Area D1* (Notification) (CH2M HILL 2004) and 40 CFR 761.61(a), self-implementing on-site cleanup and disposal of PCB remediation waste. The objectives of the 2004 cleanup action were achieved, and Building 84A UL#01 meets the criteria for permanent site closure.

The remainder of the document is divided as follows: Section 2.0 provides a description of the site background and previous sampling efforts. Section 3.0 provides a description of the removal action performed at Building 84A UL#01 in September 2004, including a description of concrete removal, verification sampling activities, and analytical results. Section 4.0 provides the rationale for site closure, and Section 5.0 provides conclusions for this document. Section 6.0 provides references used in the preparation of this document.

2.0 PCB Site Identification and Background

Based on review of historical records and analytical results for additional sampling, one PCB site has been identified at Building 84A, located in Investigation Area (IA) D1. PCB site Building 84A UL#01 is a stain-specific location on the concrete/tile floor inside of Building 84A. The source of the stain is unknown.

In February 1995, Supervisor of Shipbuilding Portsmouth (SSPORTS) personnel collected three samples from concrete, five samples from tile, and one metal sample from Building 84A, as shown in Table 2-1. These samples were a combination of solid and wipe samples. Data from two of the three concrete samples were missing from the Navy files, and therefore the PCB concentrations for those sample locations are unknown. The PCB concentration in the third concrete sample was 0.73 micrograms per 100 square centimeters ($\mu\text{g}/100\text{ cm}^2$). PCBs were not detected in the tile samples above the laboratory reporting limits, and PCBs were detected in the metal sample at a concentration of 1.12 milligram per kilogram (mg/kg) (Table 2-1).

As there were no analytical data reports available in the Navy files to confirm some of these sample results, CH2M HILL performed additional sampling and laboratory analysis in April 2004 to replace the missing sample results for the two concrete samples. In April 2004, CH2M HILL collected two concrete samples from approximately the same locations as the previous two concrete samples with missing data. PCB concentrations in these two samples were 0.867 mg/kg and 1.72 mg/kg, respectively, as shown in Table 2-1. In addition, CH2M HILL collected one metal wipe sample from the approximate location of the previous metal sample, as the units of the previous results (mg/kg) did not correspond with the medium (i.e., PCB samples for metals are usually collected as wipe samples with units of $\mu\text{g}/100\text{ cm}^2$). During an April 2004 site visit, there was no visible evidence that SSSPORTS collected solid samples from the metal. PCBs were not detected above the laboratory reporting limit in the CH2M HILL metal wipe sample.

Figure 2-1 shows the previous sampling locations and the analytical results for each sample. A summary of the PCB results are shown in Table 2-1. (Complete analytical data were provided in Attachment A of the Notification [CH2M HILL 2004].)

TABLE 2-1

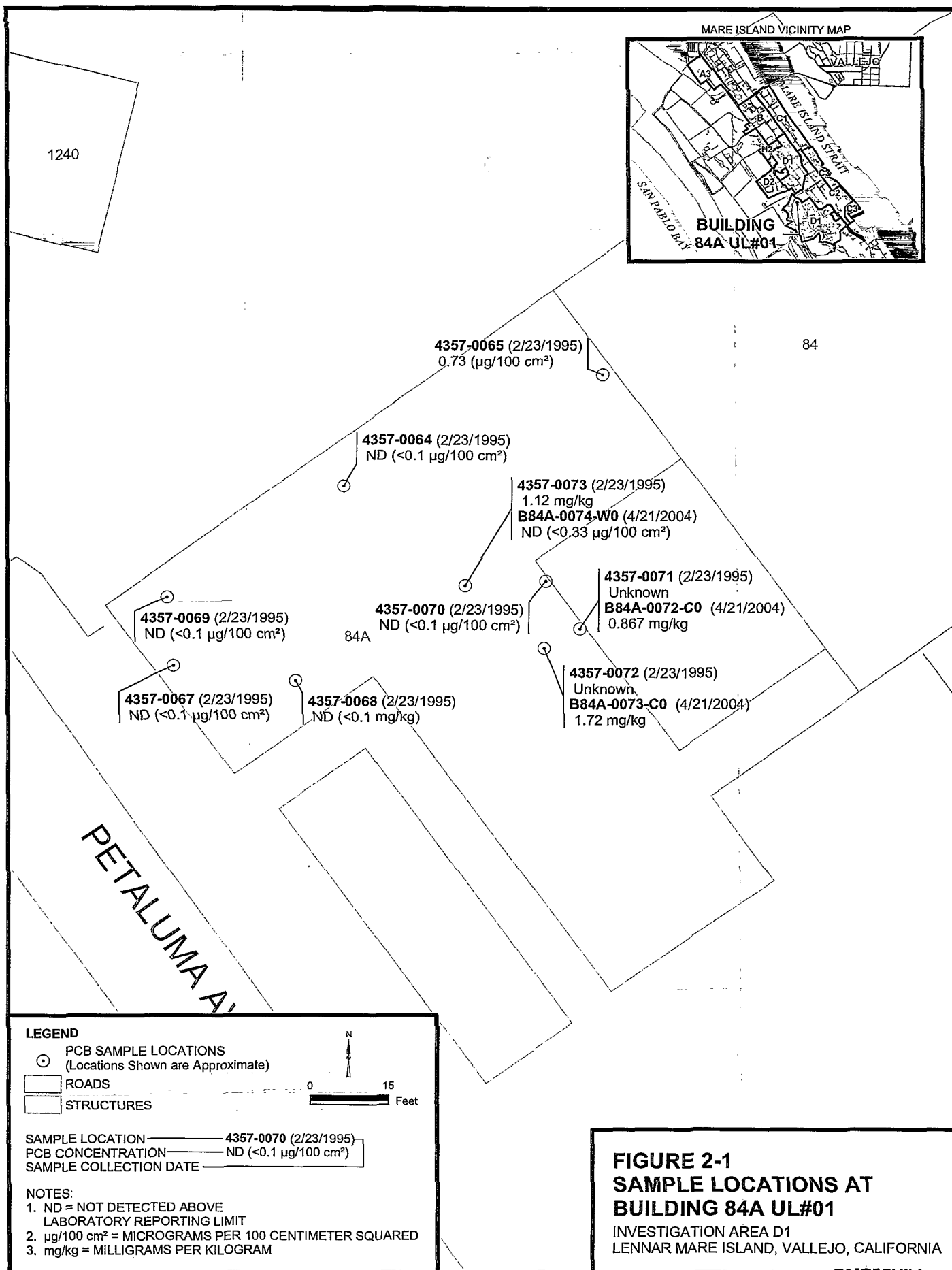
Sample Results for Building 84A UL#01 – February 1994 and April 2004

PCB Site Building 84A, Investigation Area D1, Mare Island, Vallejo, California

Sample Number	Sample Matrix	Sample Date	PCB Concentration	Comments
4357-0070	Tile	02/1995	ND (<0.1 µg/100 cm ²)	
4357-0071	Concrete	02/1995	Unknown	
4357-0072	Concrete	02/1995	Unknown	
4357-0073	Metal	02/1995	1.12 mg/kg	Result in mg/kg units does not match media and observations during April 2004 site visit.
4357-0064	Tile	02/1995	ND (<0.1 µg/100 cm ²)	
4357-0065	Concrete	02/1995	0.73 µg/100 cm ²	
4357-0067	Tile	02/1995	ND (<0.1 µg/100 cm ²)	
4357-0068	Tile	02/1995	ND (< 0.1 mg/kg)	Result in mg/kg units does not match media and observations during April 2004 site visit.
4357-0069	Tile	02/1995	ND (<0.1 µg/100 cm ²)	
B84A-0072-C0	Concrete	04/2004	0.867 mg/kg	Resample of location 4357-0071
B84A-0073-C0	Concrete	04/2004	1.72 mg/kg	Resample of location 4357-0072
B84A-0074-W0	Metal	04/2004	ND (<0.33 µg/100 cm ²)	Resample of location 4357-0073

Notes:

UL = Unknown Location.
mg/kg = milligrams per kilogram.
µg/100 cm² = micrograms per 100 square centimeters.
ND = not detected (laboratory reporting limit in parenthesis).



3.0 2004 Removal Action Summary

The concrete floor removal action at Building 84A UL#01 was conducted on September 28 and 29, 2004, in accordance with the Notification (CH2M HILL 2004). The objective of the cleanup action was to remove PCB-impacted concrete at the one location where the PCB concentration exceeded the cleanup goal of 1 mg/kg (B84A-0073-C0 at 1.72 mg/kg), as shown on Table 2-1 and Figure 2-1. The cleanup action area also included the adjacent sample location B84A-0072-C0 (0.867 mg/kg). Analytical data sheets for the verification sampling are included in Appendix A. Photo documentation of the 2004 removal action is presented in Appendix B.

The entire thickness of PCB-impacted concrete was removed from a 4-foot by 12-foot area (48 square feet) around B84A-0072-C0 and B84A-0073-C0 in Building 84A UL#01. The thickness of the concrete floor ranged from approximately three to four inches. While performing the concrete removal action, a void beneath the concrete removal area was encountered. The void is approximately 4 feet below the bottom of the concrete floor removal area and has a soil surface. The void is likely a crawl space beneath the building and only contains piping. No asbestos piping or insulation was observed.

Before the removed concrete was replaced, three soil verification samples were collected from the bottom of the void. Figure 3-1 presents the locations of the concrete removal area and soil verification samples. The verification samples were collected in accordance with 40 CFR 761 Subpart O. The soil samples were submitted to the CH2M HILL Applied Sciences Group for analysis of PCBs by USEPA Method SW8082. A comprehensive list of the analytical methods, reporting limit objectives, and quality assurance/quality control requirements for samples can be found in the *Quality Assurance Project Plan* (CH2M HILL 2001). Analytical data sheets for the verification sampling are included in Appendix A and a summary of the analytical data is presented in Table 3-1.

PCBs were not detected above laboratory reporting limits in two of the three verification samples. PCBs were only detected in one verification sample (B84AUL01-0807-S0.5) at a concentration of 0.0849 mg/kg. This concentration does not exceed the cleanup goal of 1 mg/kg and, therefore, further removal actions were not performed.

The removed concrete was directly placed into steel bins and temporarily stored on-site prior to the receipt of waste characterization sample results. The concrete was replaced and restored to the previous site conditions. A total of approximately one cubic yard of concrete was removed from Building 84A UL#01, transported off-site and disposed of at the Kettleman Hills waste disposal facility, located in Kettleman City, California. Appendix C provides the hazardous waste manifest for the transport and disposal of this waste.

TABLE 3-1

PCB Verification Sampling Results at Building 84A UL#01

PCB Site Building 84A, Investigation Area D1, Mare Island, Vallejo, California

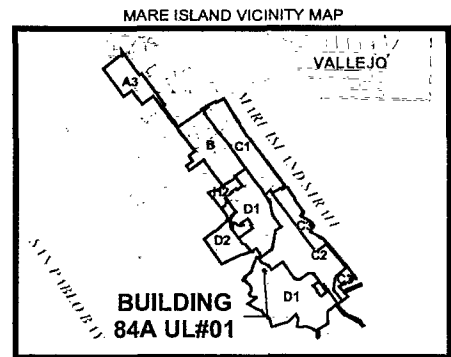
Verification Sample Number	Aroclor-1260 Concentration ^a (mg/kg)	Sample Date	Sample Location
B84AUL01-0805-S0.5	ND (< 0.0361)	09/30/2004	Soil beneath western end of concrete removal area
B84AUL01-0806-S0.5	ND (< 0.0313)	09/30/2004	Soil beneath central portion of concrete removal area
B84AUL01-0807-S0.5	0.0849	09/30/2004	Soil beneath eastern end of concrete removal area

Notes:

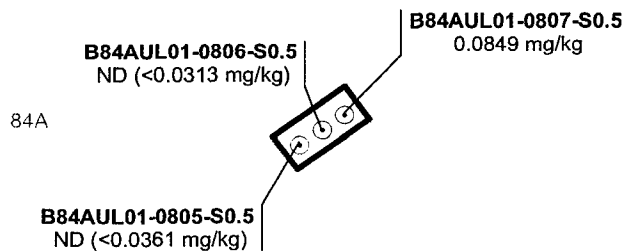
^a All other Aroclors were not detected above laboratory reporting limits.

ND = not detected (laboratory reporting limit)

1240



84



PETA

LEGEND

- PCB VERIFICATION SAMPLE LOCATIONS
(Locations Shown are Approximate)
- APPROXIMATE LOCATION OF CONCRETE REMOVAL
- ROADS
- STRUCTURES

SAMPLE LOCATION ————— B84AUL01-0805-S0.5
PCB CONCENTRATION ————— ND (<0.0361 mg/kg)
SAMPLE COLLECTION DATE —————

0 15
Feet



NOTES:

1. ND = NOT DETECTED ABOVE
LABORATORY REPORTING LIMIT
2. mg/kg = MILLIGRAMS PER KILOGRAM

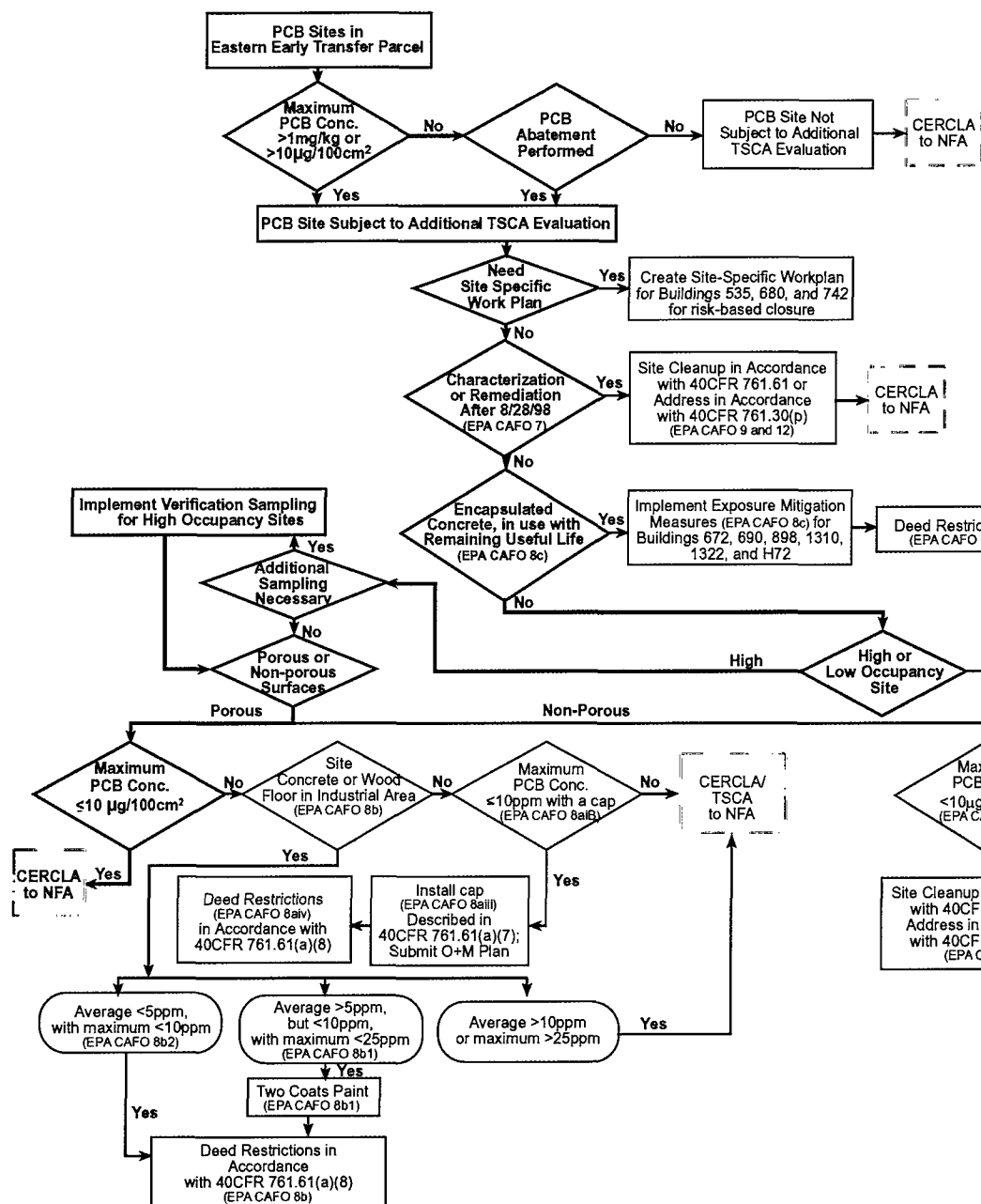
FIGURE 3-1
PCB VERIFICATION SAMPLING
RESULTS AT BUILDING 84A UL#01
INVESTIGATION AREA D1
LENNAR MARE ISLAND, VALLEJO, CALIFORNIA

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4.0 PCB Site Closure Process

The *Final Polychlorinated Biphenyl Work Plan* (CH2M HILL 2003) illustrates the process for PCB site closure under CERCLA and TSCA.

At Building 84A UL#01, PCB cleanup was performed in September 2004. No further sampling or cleanup is necessary at this site. Concrete from Building 84A UL#01 was removed where necessary. The maximum remaining PCB concentration at Building 84A UL#01 is 0.0849 mg/kg in soil beneath the concrete floor removal area. Therefore, this site is in compliance with the PCB cleanup levels for porous media in high-occupancy areas, as provided in 40 CFR 761.61(a)(4). A No Further Action (NFA) determination under TSCA would be protective of human health and the environment at Building 84A UL#01. In compliance with this process, Figure 4-1 provides a flowchart illustrating the PCB site closure process, with the path for Building 84A UL#01 highlighted.



Notes: EPA CAFO # = EPA Consent Agreement and Final Order paragraph number

NFA = No further action

O+M = Operations and Maintenance

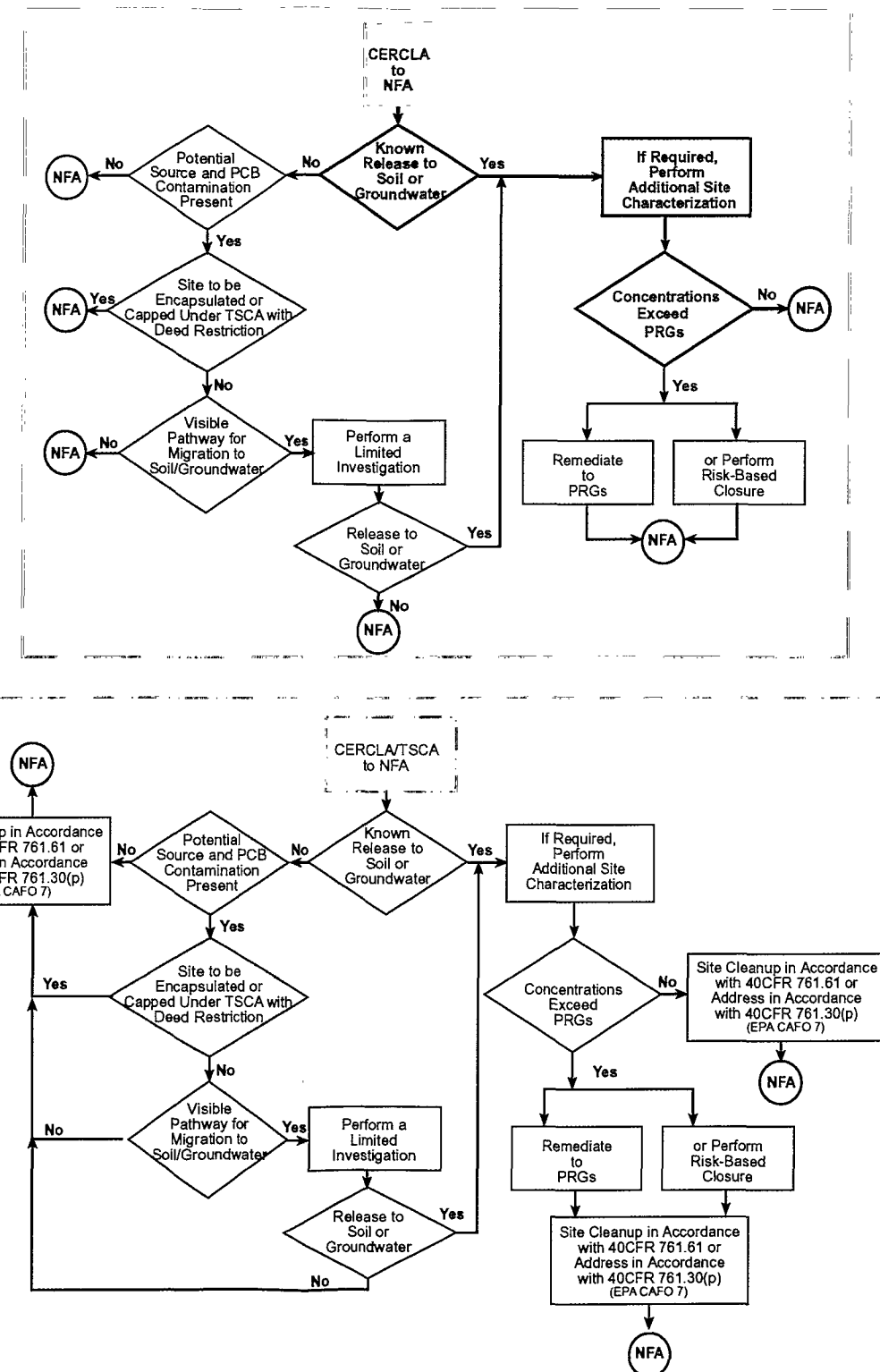


FIGURE 4-1
PATH FOR PCB SITE CLOSURE
AT BUILDING 84A UL#01
LENNAR MARE ISLAND, VALLEJO, CALIFORNIA

5.0 Conclusions

In February 1995, SSPTS personnel collected samples from concrete, tile, and metal from Building 84A UL#01. As there were no analytical data reports available in the Navy files to confirm some of these sample results, CH2M HILL performed additional sampling to replace the missing sample results for two concrete samples and one metal sample. In April 2004, CH2M HILL collected two concrete samples from approximately the same locations as the previous two concrete samples with missing data. PCB concentrations in one of the concrete samples exceeded 1 mg/kg. Concrete removal actions were conducted at this location within Building 84A UL#01 to remove PCB concentrations in concrete that exceeded 1 mg/kg.

Verification sampling results following the concrete removal action had a maximum remaining PCB concentration of 0.0849 mg/kg in the soil beneath the removal area. The maximum remaining PCB concentration in a wipe sample on the building floor at Building 84A UL#01 is 0.73 µg/100 cm².

NFA under TSCA is appropriate for Building 84 UL#01 because the maximum remaining concentrations of PCBs do not exceed the PCB cleanup levels in high-occupancy areas (1 mg/kg for solid samples and 10 µg/100 cm² for wipe samples), as provided in 40 CFR 761.61(a)(4). An NFA under TSCA would be protective of human health and the environment at Building 84A UL#01. Consequently, in accordance with Paragraph 6 of the CA/FO, it is requested that USEPA issue an NFA determination for Building 84A UL#01.

6.0 References

CH2M HILL. 2001. *Final Quality Assurance Project Plan*. November.

_____. 2003. *Final Polychlorinated Biphenyl Work Plan*. March 7.

_____. 2004. *Notification Regarding Self-Implementing On-site Cleanup and Disposal of Polychlorinated Biphenyl Remediation Waste at Building 84A, Eastern Early Transfer Parcel, Mare Island, Vallejo, California*. August.

United States Environmental Protection Agency, United States Department of the Navy, the City of Vallejo, and Lennar Mare Island. 2001. *Complaint/Consent Agreement and Final Order between Lennar Mare Island, the City of Vallejo, the U.S. Department of the Navy, and the U.S. Environmental Protection Agency Region IX*. EPA Docket No. TSCA-9-2002-0002. December 20.

Appendix A

2004 Removal Action Analytical Data

1A
ORGANICS ANALYSIS DATA SHEET

Lab Name: <u>CH2M HILL/LAB/CVO</u>	Contract #: <u>920594.OTC</u>	Field Sample ID: B84AUL01-0805-S0.5
Lab Code: <u>CVO</u>	Case No.: <u>D4223</u>	SDG No.: <u>D4223</u>
Matrix: <u>SOIL</u>	SAS No.: <u>D4223</u>	Lab Sample ID: <u>D422301</u>
Sample Amt.: <u>10.018 g</u>		Lab File ID: <u>007F0701.D</u>
% Moisture: <u>9</u>	Decanted: <u>Y</u>	Date Received: <u>10/01/04</u>
Extraction: <u>Sonic</u>		Date Extracted: <u>10/01/04</u>
Extract Vol.: <u>5 ml</u>		Date Analyzed: <u>10/01/04</u>
Injection Vol.: <u>3.0 ul</u>		Dilution Factor: <u>1</u>
GPC Cleanup: <u>N</u>		Sulfur Cleanup: <u>Y</u>

Concentration Units: ug/Kg

CAS #	Analyte	MDL	PQL	Result	Confirm	Q
12674-11-2	PCB-1016	2.51	36.1	36.1		U
11104-28-2	PCB-1221	10.4	36.1	36.1		U
11141-16-5	PCB-1232	6.88	36.1	36.1		U
53469-21-9	PCB-1242	4.32	36.1	36.1		U
12672-29-6	PCB-1248	5.14	36.1	36.1		U
11097-69-1	PCB-1254	2.68	36.1	36.1		U
11096-82-5	PCB-1260	2.68	36.1	36.1		U

Surrogate	% Rec.	QC Limits	Qualifier
Decachlorobiphenyl	93.9	25-143	

Comments:

Possible technical chlordane contamination.

1A
ORGANICS ANALYSIS DATA SHEET

Lab Name: <u>CH2M HILL/LAB/CVO</u>	Contract #: <u>920594.OTC</u>	Field Sample ID: <div style="border: 1px solid black; padding: 2px; display: inline-block;">B84AUL01-0806-S0.5</div>
Lab Code: <u>CVO</u>	Case No.: <u>D4223</u>	SDG No.: <u>D4223</u>
Matrix: <u>SOIL</u>	SAS No.: <u>D4223</u>	Lab Sample ID: <u>D422302</u>
Sample Amt.: <u>11.368 g</u>		Lab File ID: <u>008F0801.D</u>
% Moisture: <u>7</u>	Decanted: <u>Y</u>	Date Received: <u>10/01/04</u>
Extraction: <u>Sonic</u>		Date Extracted: <u>10/01/04</u>
Extract Vol.: <u>5 ml</u>		Date Analyzed: <u>10/01/04</u>
Injection Vol.: <u>3.0 ul</u>		Dilution Factor: <u>1</u>
GPC Cleanup: <u>N</u>		Sulfur Cleanup: <u>Y</u>

Concentration Units: ug/Kg

CAS #	Analyte	MDL	PQL	Result	Confirm	Q
12674-11-2	PCB-1016	2.18	31.3	31.3		U
11104-28-2	PCB-1221	9.05	31.3	31.3		U
11141-16-5	PCB-1232	5.97	31.3	31.3		U
53469-21-9	PCB-1242	3.75	31.3	31.3		U
12672-29-6	PCB-1248	4.46	31.3	31.3		U
11097-69-1	PCB-1254	2.32	31.3	31.3		U
11096-82-5	PCB-1260	2.32	31.3	31.3		U

Surrogate	% Rec.	QC Limits	Qualifier
Decachlorobiphenyl	93.9	25-143	

Comments:

Possible technical chlordane contamination.

1A
ORGANICS ANALYSIS DATA SHEET

Lab Name: <u>CH2M HILL/LAB/CVO</u>	Contract #: <u>920594.OTC</u>	Field Sample ID: <div style="border: 1px solid black; padding: 2px; display: inline-block;">B84AUL01-0807-S0.5</div>
Lab Code: <u>CVO</u>	Case No.: <u>D4223</u>	SDG No.: <u>D4223</u>
Matrix: <u>SOIL</u>	SAS No.: <u>D4223</u>	Lab Sample ID: <u>D422303</u>
Sample Amt.: <u>11.064 g</u>		Lab File ID: <u>009F0901.D</u>
% Moisture: <u>8</u>	Decanted: <u>Y</u>	Date Received: <u>10/01/04</u>
Extraction: <u>Sonic</u>		Date Extracted: <u>10/01/04</u>
Extract Vol.: <u>5 ml</u>		Date Analyzed: <u>10/01/04</u>
Injection Vol.: <u>3.0 ul</u>		Dilution Factor: <u>1</u>
GPC Cleanup: <u>N</u>		Sulfur Cleanup: <u>Y</u>

Concentration Units: ug/Kg

CAS #	Analyte	MDL	PQL	Result	Confirm	Q
12674-11-2	PCB-1016	2.26	32.4	32.4		U
11104-28-2	PCB-1221	9.39	32.4	32.4		U
11141-16-5	PCB-1232	6.19	32.4	32.4		U
53469-21-9	PCB-1242	3.88	32.4	32.4		U
12672-29-6	PCB-1248	4.62	32.4	32.4		U
11097-69-1	PCB-1254	2.41	32.4	32.4		U
11096-82-5	PCB-1260	2.41	32.4	84.9	73.7	

Surrogate	% Rec.	QC Limits	Qualifier
Decachlorobiphenyl	87.7	25-143	

Comments:

Appendix B
2004 Removal Action Photo Documentation

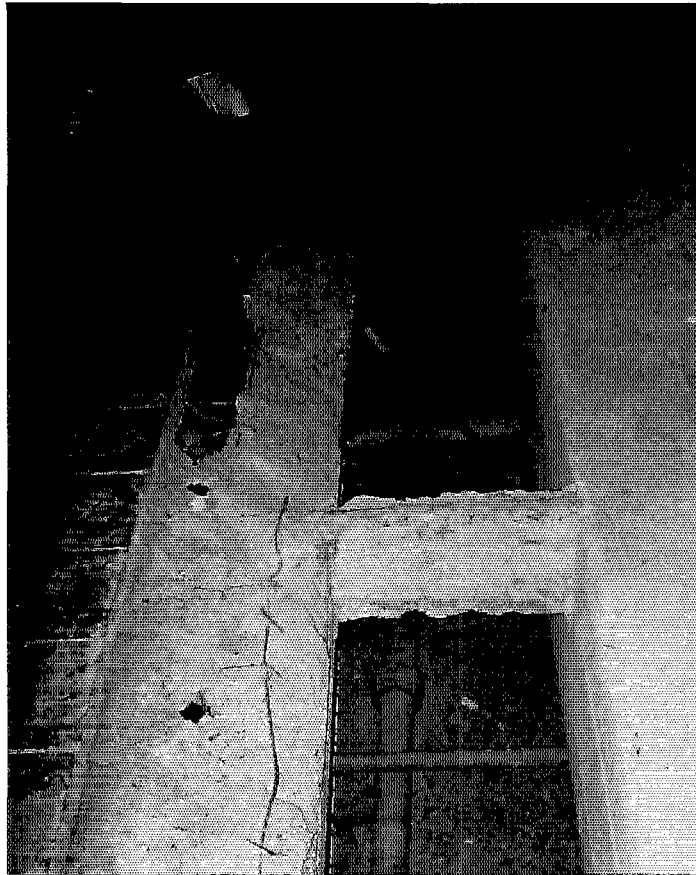


Photo 1. Void underneath concrete removal area, Building 84A UL#01



Photo 2. Building 84A UL#01 concrete removal area, looking east (spray paint indicates verification sample locations)

Appendix C
2004 Removal Action Hazardous Waste Manifest

